

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs and)	
Counterdefendants,)	
)	
v.)	C.A. No. 20-613 (SB)
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**THOMSON REUTERS' MOTION TO EXCLUDE
DR. JAMES RATLIFF AND DR. GILLIAN HADFIELD**

Pursuant to Federal Rule of Civil Procedure 56, Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (collectively, "Thomson Reuters") respectfully move to exclude certain testimony, argument, or evidence regarding the opinions of ROSS Intelligence Inc.'s experts Dr. James Ratliff and Dr. Gillian Hadfield.

The grounds for this motion are set forth in Thomson Reuters' opening brief and supporting exhibits and declarations, filed concurrently. A proposed order is attached.

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/s/ Michael J. Flynn

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August 31, 2023

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CERTIFICATION UNDER D. DEL. LR 7.1.1

Pursuant to D. Del. LR 7.1.1, counsel for Plaintiffs made reasonable efforts to reach agreement with Defendant ROSS Intelligence, Inc. on the foregoing Motion, and ROSS's counsel has stated that it will oppose the requested relief.

/s/ Michael J. Flynn

Michael J. Flynn (#5333)

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[PROPOSED] ORDER

This Court, having considered Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation's (collectively, "Thomson Reuters") Motion to Exclude Dr. James Ratliff and Dr. Gillian Hadfield and the related briefing and argument thereto,

IT IS HEREBY ORDERED this ____ day of _____ 2023 that Thomson Reuters' Motion for Summary Judgment is **GRANTED**.

Date: _____

The Honorable Stephanos Bibas

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on August 31, 2023, upon the following in the manner indicated:

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